

KSC/7.11.19

AS: USAO#2019R00455

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2019 JUL 17 PM 3: 25

**IN THE UNITED STATES DISTRICT COURT OFFICE
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**MICHAEL DANIEL ALLAIRE,
a.k.a. "POP"
a.k.a. "POPS"**

Defendant.

BY _____ DEPUTY

CRIMINAL NO. JKB-19-0336

**(Possession with Intent to Distribute
Cocaine Base and Cocaine, 21 U.S.C. §
841; Forfeiture, 21 U.S.C. § 853)**

INDICTMENT

COUNT ONE

(Possession with Intent to Distribute Cocaine Base and Cocaine)

The Grand Jury for the District of Maryland charges that:

On or about March 6, 2019, in the District of Maryland, the defendant,

MICHAEL DANIEL ALLAIRE,

did knowingly and intentionally possess with the intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)
21 U.S.C. § 841(b)(1)

FORFEITURE ALLEGATIONS

The Grand Jury further finds that:

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of 21 U.S.C. § 841, as set forth in Count One, the defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation,

including but not limited to approximately \$22,965 in U.S. currency seized from the defendant on March 6, 2019.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

Robert K. Hur / A.S.
Robert K. Hur
United States Attorney

SIGNATURE REDACTED

Foreperson

Date:

July 17, 2019